

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: JAMES M. ANDERSEN	§	Case No. 24-80232 (ARP)
Debtor	§	Chapter 13
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ELIZABETH THOMAS	§	
Co-Debtor	§	
<hr/>		
vs.	§	
<hr/>		
PCF INVESTMENTS INC a/k/a	§	
PCF PROPERTIES IN TEXAS LLC.	§	
. Creditor	§	
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	§	

**MOTION FOR ORDER SHORTENING TIME FOR NOTICE
OF THE HEARING TO CONSIDER EXPEDITED APPLICATION FOR
ENTRY OF AN AGREED TO ORDER LIFTING THE AUTOMATIC STAY**

THIS IS A MOTION FOR ENTRY OF AN AGREED ORDER CONDITIONING THE AUTOMATIC STAY. IF YOU OBJECT TO THE GRANTING OF RELIEF, YOU SHOULD CONTACT THE MOVANT IMMEDIATELY TO TRY TO REACH AN AGREEMENT. IF YOU CANNOT REACH AN AGREEMENT, YOU MUST FILE A WRITTEN RESPONSE AND SEND A COPY TO MOVANT WITHIN 14 DAYS OF THE DATE THIS WAS MAILED TO YOU. IF NO TIMELY OPPOSITION IS FILED, THE COURT MAY GRANT THE RELIEF WITHOUT A HEARING.

1. The motion requests an order from the Bankruptcy Court authorizing the Movants filing this motion to proceed with an Civil Appeal pending in the U.S. The Court of Appeals for Third Circuit the under cause number 24-1979.
2. Movant are Debtor, Andersen, Co-Debtor Thomas and Creditor PCF Investments Inc. a/k/a PCF Properties in Texas LLC.
3. The Movants, Debtor, Andersen, Co-Debtor Thomas and Creditor PCF Investments Inc. a/k/a PCF Properties in Texas LLC have agreed to condition the lifting of the automatic stay pursuant to the terms of the attached agreed order. Accordingly the parties request entry of the agreed order on a expedite basis.

Date: August 16, 2024.

Respectfully submitted,

THE JAMES M. ANDERSEN LAW FIRM

/s/James M. Andersen

James M. Andersen

Attorney at Law

Texas State Bar No. 01165850

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Certificate of Service and Certificate of Compliance with BLR 4001

A copy of this motion was served on the persons shown on Exhibit “1” at the addresses reflected on that exhibit on August 16, 2024, by prepaid United States first class mail. Movant certifies that movant has complied with Bankruptcy Local Rule 4001.

/s/James M. Andersen

James M. Andersen

CREDITORS MATRIX

Donald Burris
6046 FM 2920
Spring Tx. 77379
(last known address need to update)

Costco Anywhere Visa card by Citi
P. O. Box 790046
St. Louis, Mo. 63179-0046

PCF Properties in Texas LLC.
A SUBSIDIARY OF PCF INVESTMENTS INC.
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PCF Properties in Texas LLC
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